



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

SEP 25 2013

REPLY TO THE ATTENTION OF:

Matthew Stuckey  
Chief  
Permits Branch  
Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue  
Indianapolis, Indiana 46204

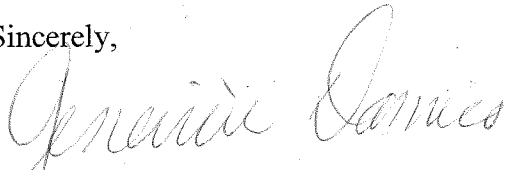
Dear Mr. Stuckey:

The U.S. Environmental Protection Agency has reviewed the draft new source construction and part 70 operating permit, permit number T049-33190-00038, for Zimmerman Energy, LLC, in Argos, Indiana. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

1. According to the technical support document, potential Carbon Monoxide (CO) emissions from the four Internal Combustion (IC) engines are 246.59 tons per year (tpy). Permit condition D.1.6 requires a one-time CO emission stack testing for the four engines. Since potential CO emissions are close to the 250 tpy Prevention of Significant Determination (PSD) threshold, IDEM should either require periodic testing, parametric monitoring or provide an explanation of why the one-time test is sufficient to assure that CO emissions remain below the PSD threshold.
2. Permit condition E.1.2 states that the source is subject to 40 CFR Part 60, Subpart JJJJ. Among the applicable provisions of Subpart JJJJ listed in the permit is 40 CFR 60.4233. Since 40 CFR 60.4233 has multiple emission standard requirements based on engine power, type of fuel used, and date of manufacture, the permit should clarify which specific emission standard(s) are applicable to the four IC engines.
3. Permit condition E.2.2 states that the source is subject to "40 CFR 60.752(b)(iii)(C)" and "40 CFR 60.752(b)(iii)(B)" of 40 CFR Part 60, Subpart WWW. This does not match the codification in Subpart WWW. Please clarify the correct rule citations from Subpart WWW applicable to this source.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Sam Portanova at (312) 886-3189.

Sincerely,

A handwritten signature in cursive script, reading "Genevieve Damico". The ink is dark and the signature is fluid, with a large loop at the end of the last name.

Genevieve Damico  
Chief  
Air Permits Section